

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MUNIR UWAYDAH as Guardian of L.U.,

Plaintiff,

Case No.: 1: 25-cv-02739-AS

-against-

DECLARATION IN SUPPORT OF
APPLICATION FOR DECLARATORY
AND INJUNCTIVE RELIEF

THE COLLEGE BOARD INC.

Defendant,

Stacey Van Malden, an attorney duly admitted to the practice of law in the Courts of the State of New York, and the United States District Court for the Southern District of New York declares the following under penalty of perjury:

1. I am the attorney for the Plaintiff in this action.
2. As such, I am fully familiar with the facts and circumstances herein.
3. I make this declaration in support of Plaintiff's Order to Show Cause for injunctive and/or declaratory relief.
4. Appended to this Declaration are the following exhibits which have been redacted pursuant to this Court's rules:
 - a. Letter dated January 31, 2025 from the College Board
 - b. Letter dated March 8, 2024 from the College Board
 - c. Neuropsychological Assessment Report dated October 30, 2024
 - d. Neuropsychological Assessment Report dated December 21, 2023
 - e. Medical Report dated October 25, 2024
 - f. Test of Variables of Attention dated April 25, 2023
 - g. Test of Variables of Attention dated August 28, 2023

- h. Letter from Learning Support Team dated December 6, 2024
 - i. Letter from Learning Support Team dated February 20, 2025
5. L.U. is seeking this immediate relief because times of the essence.
6. The examinations L.U. Seeks to sit for will take place in May, 2025.

WHEREFORE, it is most respectfully requested that this Honorable Court grant Plaintiff a preliminary injunction barring defendant from denying him the accommodations under ADA that he needs to take the May AP Physics Test and SAT examination, and/or granting a Declaratory Judgment that Defendant must grant Plaintiff the accommodations that he seeks, and for such other and further relief that this Court may deem just and proper.

Dated: New York, New York
April 7, 2024

Respectfully submitted,



Stacey Van Malden, Esq.
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